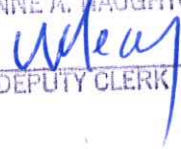


UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N. J. LBR 9004-2 (c)	U.S. BANKRUPTCY COURT FILED NEWARK, NJ 2022 JAN 11 P 3:05
CITY OF MILWAUKEE Office of the City Attorney 841 North Broadway Milwaukee, WI 53202 (414) 286-2601 Representative for Creditor, City of Milwaukee Hannah R. Jahn, Wis. Bar No. 1088851 Email: hjahn@milwaukee.gov	JEANNE A. NAUGHTON BY:  DEPUTY CLERK
In re: Supportive Health, LLC, Debtor.	Case No. 21-15113-VFP Chapter 7 Judge: Hon. Vincent F. Papalia Hearing Date: January 18, 2023, 10:00am

CREDITOR CITY OF MILWAUKEE'S OBJECTION
TO DEBTOR SUPPORTIVE HEALTH, LLC'S MOTION TO DISMISS THE CITY OF
MILWAUKEE'S PROOF OF CLAIM FOR FRAUD, ISSUE SANCTIONS AGAINST
THE CITY OF MILWAUKEE, AND TERMINATE THE BANKRUPTCY

Creditor City of Milwaukee objects to Supportive Health, LLC and Carline Bolivar's Motions dated December 13, 2022, and adds the following certification in support of those objections.

First, Ms. Bolivar and Supportive Health's argument that the bankruptcy case is *void ab initio* has previously been heard and denied by this Court. See Doc. 71.

Second, the City of Milwaukee's proof of claim is not fraudulent, nor is there any evidence that the City or the Trustee engaged in any misrepresentation, intentional or otherwise, in pursuing payment of the City claim.

Hannah R. Jahn certifies as follows:

1. I am an Assistant City Attorney for the City of Milwaukee, creditor of the debtor.
2. I am responsible for supervision of the City's contract collection counsel, Kohn Law Firm. I conferred with Kohn Law Firm shareholder Jason Hermersmann in preparing this statement.
3. I verified that the City claim form was correct as it was submitted. The City claim was not secured on 3269 South New York Avenue, Milwaukee, WI ("New York Ave. Property") or 2229 East Eden Place, St. Francis, WI ("Eden Place Property") at the time the claim was filed.
4. Supportive Health asserted the City judgment in Milwaukee County Case No. 2016CV255 was part of the bankruptcy estate, so that is why the City filed a claim.
5. The City believes there should be a lien on the property, which is the basis for pending Milwaukee County Circuit Court Case 2017CV12487.
6. In 2017CV12487, the City sought to foreclose on the Eden Place Property through a declaration that the transfer of the real estate to Supportive Health by Mr. Jean-Paul by quit-claim deed in February 2016 was a fraudulent transfer to allow Mr. Jean-Paul avoid paying debt owed to the City. The circuit court

judge has not yet decided the issue because the case is stayed pending this bankruptcy.

7. As stated in the City's letter to this Court dated December 3, 2021 (Doc. 69) and supported by the electronic Real Estate Transfer Tax Returns attached to Doc. 69:

As of January 12, 2016, Jean-Paul owned property located at 2229 East Eden Place, St. Francis, Wisconsin 53235 (hereinafter "Eden Place property"). On January 12, 2016, the City of Milwaukee (hereinafter "the City") filed Milwaukee County Case No. 16 CV 255 ("Underlying Case") alleging that Jean-Paul owed the City for certain raze charges that were incurred on separate properties owned by Jean-Paul. On January 21, 2016, Jean-Paul was served with the Summons and Complaint for the Underlying Case. On February 17, 2016, Jean-Paul transferred the Eden Place property to Supportive Health, LLC via a quit claim deed in order to avoid a judgment lien attachment. On that same date, Jean-Paul also transferred 3269 South New York Avenue, Milwaukee, Wisconsin 53207 to Supportive Health via a quit-claim deed. The agent for Supportive Health was Jean-Paul, who also prepared and filed the real estate transfer tax returns with the State of Wisconsin.

8. As shown in Claim 3-1 Part 2, on March 15, 2016, the Milwaukee County Circuit Court docketed a judgment in favor of the City of Milwaukee against Perrault Jean-Paul.
9. This certification is being made assist the Court in making an informed decision.
10. I certify under penalty of perjury that the above is true.

Date:

Jan. 10, 2023

Hannah R Jahn
Hannah R. Jahn, Assistant City Attorney

HANNAH R. JAHN
414-286-601 2664
MILWAUKEE CITY ATTORNEYS OFFICE
841 N BROADWAY
MILWAUKEE WI 53202

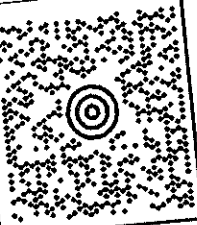
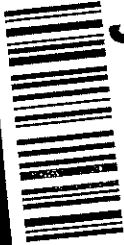
1.0 LBS LTR

1 OF 1

SHIP TO:
CLERK TO HON. VINCENT F. PAPALIA

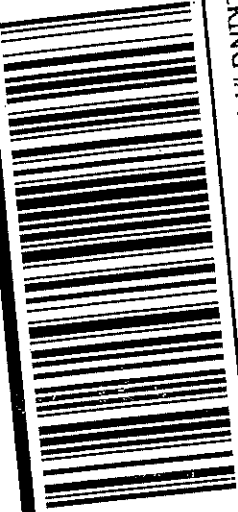
9736453730
NEWARK US BANKRUPTCY COURT -NJ
P.O. BOX 1352
50 WALNUT STREET
NEWARK NJ 07102

NJ 071 0-02

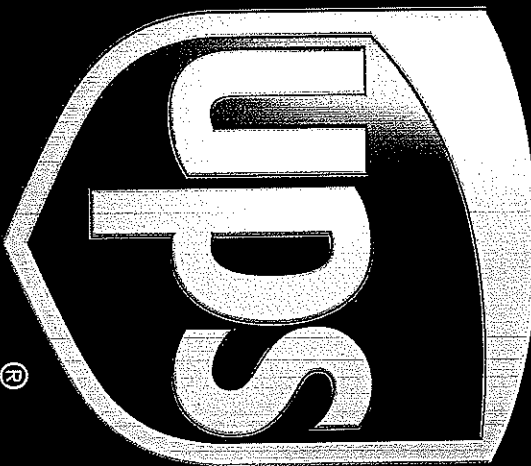


UPS NEXT DAY AIR EARLY **1+**

TRACKING #: 1ZV82 395 15 9416 3249



BILLING: P/P



Synchronizing the world of commerce SM